

# **EXHIBIT 2**

## Marie Jonas

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**From:** Jiyun Cameron Lee  
**Sent:** Tuesday, July 13, 2021 3:27 PM  
**To:** Jeremiah Frei-Pearson; Amanda Chan; Chantal Khalil  
**Cc:** Marie Jonas; Michael Ram x20021; Marie Appel x20020; Christina Romero x20069  
**Subject:** RE: Lowell v. Lyft - Response to Correspondence and Other Outstanding Discovery Matters

Jeremiah,

Thank you for your email. And Michael, Marie and Christina – it is nice to meet you by email.

We will look for Plaintiffs' Third Amended Responses to the Second Set of Interrogatories later this week.

As for the depositions of Mr. Lurio and Mr. Tanzman, we can confirm August 17 and 20, respectively, by Zoom. We plan to take their individual depositions on the same day. If we anticipate any difficulty completing both the 30(b)(6) and individual depositions in a single day, we will let you know.

For Ms. Chan, July 28 unfortunately does not work. Based on her lack of availability that week and in early August, here are alternate dates: August 16, 18 or 19. Please advise as soon as possible so that we can lock in a date on her calendar. We assume you will take her deposition by Zoom; if we are mistaken and you intend to take her deposition in person in San Francisco, please advise.

Best,  
Jiyun

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**FOLGER LEVIN LLP**  
**Jiyun Cameron Lee**

**Direct:** 415.625.1075  
**Email:** [jlee@folgerlevin.com](mailto:jlee@folgerlevin.com)

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**From:** Jeremiah Frei-Pearson <jfrei-pearson@FBFGLaw.com>  
**Sent:** Monday, July 12, 2021 2:30 PM  
**To:** Jiyun Cameron Lee <jlee@folgerlevin.com>; Amanda Chan <AChan@FBFGLaw.com>; Chantal Khalil <ckhalil@fbfglaw.com>  
**Cc:** Marie Jonas <mjonas@folgerlevin.com>; Michael Ram x20021 <MRam@forthepeople.com>; Marie Appel x20020 <MAppel@forthepeople.com>; Christina Romero x20069 <christinaromero@ForThePeople.com>  
**Subject:** RE: Lowell v. Lyft - Response to Correspondence and Other Outstanding Discovery Matters

Jiyun & Marie,

I hope you had a good weekend.

We anticipate that we will provide Third Amended Responses to Lyft's Second Interrogatories by the end of the week.

Ansel Lurio is available to provide 30(b)(6) deposition testimony on August 17 and Mel Tanzman is available on August 20. Please confirm that those dates work or let us know if there are any issues. To the extent you

intend to depose either in their individual capacity, we request that the depositions take place on the same day as their 30(b)(6) deposition.

We think July is a bit early for depositions, but can accommodate the request for Ms. Chan's depo to take place this month on July 28. Does that date work?

Also, I've copied in Mike, Marie and Christina, who are our co-counsel in this case. Please keep them copied on communications going forward.

Thanks,

Jeremiah

Jeremiah Frei-Pearson  
FINKELSTEIN, BLANKINSHIP, FREI-PEARSON & GARBER, LLP  
One North Broadway, Suite 900  
White Plains, NY 10601  
Tel: 914-298-3284 | Fax: 914-908-6722

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**From:** Jiyun Cameron Lee <[jlee@folgerlevin.com](mailto:jlee@folgerlevin.com)>

**Sent:** Friday, July 9, 2021 1:39 PM

**To:** Jeremiah Frei-Pearson <[jfrei-pearson@FBFGLaw.com](mailto:jfrei-pearson@FBFGLaw.com)>; Amanda Chan <[ACHan@FBFGLaw.com](mailto:ACHan@FBFGLaw.com)>; Chantal Khalil <[ckhalil@fbfglaw.com](mailto:ckhalil@fbfglaw.com)>

**Cc:** Marie Jonas <[mjonas@folgerlevin.com](mailto:mjonas@folgerlevin.com)>

**Subject:** RE: Lowell v. Lyft - Response to Correspondence and Other Outstanding Discovery Matters

Jeremiah,

I write to follow up on four outstanding issues identified below.

1. Identifying Witnesses Per Local Rules. You mentioned during our conference with Magistrate Judge Krause that Plaintiffs may have an objection to providing the information required under the Local Rules. It would be good to understand the nature of your objections, and to see if there is a way we can bridge the gap. Please let us know what objections you have so that we can discuss them.
2. PMK Deposition Dates. Please let us know if Mel Tanzman and Ansel Lurio are available for depositions during the week of July 26. If they are not, please identify dates during the week of August 2.
3. Joyce Chan Deposition. As we advised previously, we would like to have Ms. Chan's deposition conducted in July based on her schedule. Please let us know dates that work for Plaintiffs so that we can schedule the deposition and get it locked on her calendar.
4. Other Depositions. Given the need to balance everyone's schedules during the summer, we believe it is prudent to move forward with scheduling depositions as soon as possible. Please advise so that we can check with witnesses regarding their availability.

We look forward to hearing from you soon.

Best,  
Jiyun

**From:** Marie Jonas <[mjonas@folgerlevin.com](mailto:mjonas@folgerlevin.com)>  
**Sent:** Wednesday, June 30, 2021 6:18 PM  
**To:** Jeremiah Frei-Pearson <[jfrei-pearson@FBFGLaw.com](mailto:jfrei-pearson@FBFGLaw.com)>; Amanda Chan <[AChan@FBFGLaw.com](mailto:AChan@FBFGLaw.com)>; Chantal Khalil <[ckhalil@fbfglaw.com](mailto:ckhalil@fbfglaw.com)>  
**Cc:** Jiyun Cameron Lee <[jlee@folgerlevin.com](mailto:jlee@folgerlevin.com)>  
**Subject:** RE: Lowell v. Lyft - Response to Correspondence

Good evening, Jeremiah,

Under the local rules, and as confirmed in the interrogatories, "Identify," when used with reference to a Person, means "to give, to the extent known, the person's full name, present or last known address, and when referring to a natural person, additionally, the present or last known place of employment." Local Civil Rule 26.3(c)(3).

The responses that Plaintiffs provided are insufficient. Please reissue with the complete information by Friday.

Thank you. We look forward to speaking tomorrow as well.

Kindly,

Marie

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**Folger Levin LLP**  
Marie Elizabeth Jonas

**DIRECT:** 415.625.1058 / **MOBILE:** 510.219.4924  
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**From:** Jeremiah Frei-Pearson <[jfrei-pearson@FBFGLaw.com](mailto:jfrei-pearson@FBFGLaw.com)>  
**Sent:** Wednesday, June 30, 2021 2:48 PM  
**To:** Marie Jonas <[mjonas@folgerlevin.com](mailto:mjonas@folgerlevin.com)>; Amanda Chan <[AChan@FBFGLaw.com](mailto:AChan@FBFGLaw.com)>; Chantal Khalil <[ckhalil@fbfglaw.com](mailto:ckhalil@fbfglaw.com)>  
**Cc:** Jiyun Cameron Lee <[jlee@folgerlevin.com](mailto:jlee@folgerlevin.com)>  
**Subject:** RE: Lowell v. Lyft - Response to Correspondence

Good afternoon,

Attached please find Plaintiffs Second Supplemental Responses to interrogatory nos. 18-20.

We are working with our clients to prepare for the deposition and look forward to providing dates for the 30(b)(6) deposition in the near future.

Thanks and we look forward to speaking with you tomorrow.

Best,

Jeremiah

Jeremiah Frei-Pearson  
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White Plains, NY 10601  
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**From:** Marie Jonas <[mjonas@folgerlevin.com](mailto:mjonas@folgerlevin.com)>  
**Sent:** Monday, June 28, 2021 4:15 PM

**To:** Amanda Chan <[AChan@FBFGLaw.com](mailto:AChan@FBFGLaw.com)>; Chantal Khalil <[ckhalil@fbfglaw.com](mailto:ckhalil@fbfglaw.com)>  
**Cc:** Jeremiah Frei-Pearson <[jfrei-pearson@FBFGLaw.com](mailto:jfrei-pearson@FBFGLaw.com)>; Jiyun Cameron Lee <[jlee@folgerlevin.com](mailto:jlee@folgerlevin.com)>  
**Subject:** RE: Lowell v. Lyft - Response to Correspondence

Good afternoon,

I am writing to follow up on my note below and to meet and confer regarding other outstanding discovery issues in this matter.

First, by email dated April 30, Plaintiffs committed to providing a response to Interrogatory Nos. 18-20 by no later than June 15, 2021. It is now June 28. Please advise as to status, so we can be prepared to update the Magistrate Judge, if necessary.

Second, we still have not heard back from you regarding availability for WDOMI's PMK designees concerning Lyft's notice dated April 5, 2021. Please provide an update regarding status, as it is essential that we continue discovery in this matter, given the upcoming deadlines.

Third, in addition to the names outlined below, Lyft designates the following individuals as PMKs in response to your notice dated April 16, 2021.

- a. Leon Treger (topic 2)
- b. Asaf Selinger (topics 14, 19)

Most of our witnesses should have flexibility for depositions in late July through September. However, due to work and personal scheduling reasons, we would like to schedule Joyce Chan (who is designated on topics 5-7, 9-11, 25) for her deposition to be conducted in July.

Fourth, with regard to the toggle data, unfortunately the data from that time period is not available: "the data logger used to capture the locale and user info of the toggle information was broken."

Finally, please advise if there were further issues with document access.

Kindly,  
Marie

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**Folger Levin LLP**  
**Marie Elizabeth Jonas**

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**From:** Marie Jonas  
**Sent:** Tuesday, June 22, 2021 5:56 PM  
**To:** Amanda Chan <[AChan@FBFGLaw.com](mailto:AChan@FBFGLaw.com)>; Chantal Khalil <[ckhalil@fbfglaw.com](mailto:ckhalil@fbfglaw.com)>  
**Cc:** Jeremiah Frei-Pearson <[jfrei-pearson@FBFGLaw.com](mailto:jfrei-pearson@FBFGLaw.com)>; Jiyun Cameron Lee <[jlee@folgerlevin.com](mailto:jlee@folgerlevin.com)>  
**Subject:** RE: Lowell v. Lyft - Response to Correspondence

Good evening, Amanda,

I believe the link expired yesterday. I just renewed it, and you should now have access using the link below.

-Marie

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**Folger Levin LLP**

Marie Elizabeth Jonas

**DIRECT:** 415.625.1058 / **MOBILE:** 510.219.4924

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**From:** Amanda Chan <[ACHan@FBFGLaw.com](mailto:ACHan@FBFGLaw.com)>

**Sent:** Tuesday, June 22, 2021 5:50 PM

**To:** Marie Jonas <[mjonas@folgerlevin.com](mailto:mjonas@folgerlevin.com)>; Chantal Khalil <[ckhalil@fbfglaw.com](mailto:ckhalil@fbfglaw.com)>

**Cc:** Jeremiah Frei-Pearson <[jfrei-pearson@FBFGLaw.com](mailto:jfrei-pearson@FBFGLaw.com)>; Jiyun Cameron Lee <[jlee@folgerlevin.com](mailto:jlee@folgerlevin.com)>

**Subject:** RE: Lowell v. Lyft - Response to Correspondence

Marie,

Thanks for this email. We plan to address your requests more fully in the short term. Meanwhile, your OneDrive link did not allow any of us access. Is it possible to update the sharing settings or to provide us with another link?

Thank you very much.

Respectfully,

**Amanda Chan**

*Associate Attorney (Pending Admission)*

Direct No/Fax: (914) 824-1560 (ext. 41560)

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**From:** Marie Jonas <[mjonas@folgerlevin.com](mailto:mjonas@folgerlevin.com)>

**Sent:** Monday, June 14, 2021 7:14 PM

**To:** Chantal Khalil <[ckhalil@fbfglaw.com](mailto:ckhalil@fbfglaw.com)>; Amanda Chan <[ACHan@FBFGLaw.com](mailto:ACHan@FBFGLaw.com)>

**Cc:** Jeremiah Frei-Pearson <[jfrei-pearson@FBFGLaw.com](mailto:jfrei-pearson@FBFGLaw.com)>; Jiyun Cameron Lee <[jlee@folgerlevin.com](mailto:jlee@folgerlevin.com)>

**Subject:** Lowell v. Lyft - Response to Correspondence

Dear Chantal and Amanda,

I write in response to your emails dated June 2 and June 4. As you know, Jiyun and I have been in trial and attending to post-trial briefing in the matter of *ILRC et al. v. Lyft*. Please excuse the slight delay in our response.

- 1) With regard to OneDrive, we investigated your concern and all of the files are there (see the screen grab below as an example). We suspect your download was cut off. Please try redownloading the files here.

☐ [ILRC Document Production](#). If that does not work, we can arrange for an alternative FTP.

ve - Folger Levin LLP ▶ 2021-05-21 Lowell v Lyft - ILRC Case file Production ▶ ILRC Document

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a.

- 2) With regard to the toggle data, we are investigating that and will get back to you shortly. We hope to be able to provide additional information in the next few weeks, depending on resource availability.
- 3) With regard to the 30(b)(6) designees, thank you for providing the names of witnesses who will be testifying on the topics identified. Please provide dates the weeks of June 28, July 19 or July 26 when these witnesses are available for depositions via Zoom. We have preliminarily identified the following witnesses from Lyft who will testify on the PMK topics you circulated (subject to certain objections). We reserve the right to supplement or modify this list, including the specific topics to be handled by each witness. In addition, please be advised that, based on the overbreadth of your topics, individuals identified may not address the entire subject matter. After we hear about your witnesses' availability we can begin identifying dates for these initial depositions, and discuss our objections in more depth.

a. Isabella Gerundio (topics 1-4, 12-14, 19-20, 22-23)

- b. Joyce Chan (topics 5-7, 9-11, 25)
  - c. Richard Zhou (topics 2-5, 17-18, 21)
  - d. Abbas Bozorgirad (19, 22)
- 4) With regard to the documents the Judge ordered produced during the course of trial, I have added a folder accessible via the same OneDrive link above which contains these documents.

Please let me know if you have any questions or concerns.

Kindly,  
Marie

**Folger Levin LLP**

**Marie Elizabeth Jonas**

Pronouns: She/Her

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